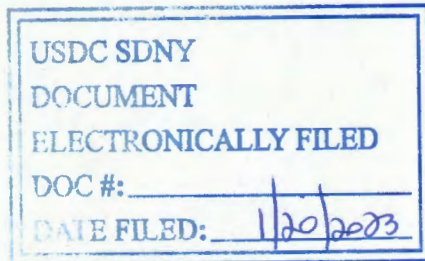


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MEMO ENDORSED

January 20, 2023

Via ECF

Hon. Colleen McMahon  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2550  
New York, NY 10007

Re: *KLM Marketing, LLC v. Samsung Opto-Electronics  
America, Inc. d/b/a Hanwha Techwin America*  
Case No. 22-cv-9952-CM

1/20/2023  
Ok, Conference adjourned to  
3/9/2023 @ 10:00 A.M.

A handwritten signature in blue ink that reads "Colleen McMahon".

Dear Judge McMahon,

We represent Plaintiff KLM Marketing, LLC ("KLM") in the above-referenced action. We write this letter jointly with counsel for Defendant Samsung Opto-Electronics America, Inc. d/b/a Hanwha Techwin America ("Hanwha") to respectfully request a 30-day adjournment of the initial pre-trial conference currently scheduled for February 9, 2023, and the corresponding deadlines concerning the filing of a case management plan.

The parties have met and conferred pursuant to Fed. R. Civ. P. 26, and agree that setting deadlines at this time may be premature. First, the parties are presently engaged in settlement discussions that, if successful, would obviate the need for a discovery plan entirely. In addition, Hanwha's deadline to response to the Complaint is January 30, 2023. Thus, if settlement discussions prove unsuccessful, the parties would have only days to formulate and submit a proposed case management plan prior to the initial conference as currently scheduled.

This is the parties' first request for an extension of the initial conference and the submission of a case management plan.

Please let us know if the Court requires any further information.

**KIRSCH &  
NIEHAUS**

We appreciate your time and attention to this matter.

Respectfully submitted,

*Craig S. Tarasoff*

Craig S. Tarasoff

cc: All parties by ECF